

SEALED BY ORDER OF COURT

OA 91 Criminal Complaint

# United States District Court

ORIGINAL  
FILED

NORTHERN

DISTRICT OF

CALIFORNIA

AUG 20 2008

UNITED STATES OF AMERICA

V.

DAPHENE MCKENZIE VICKERS,

a/k/a California Slim, Terri, Daphene Johnson, Daphene Blaylock

 RICHARD W. WIEKING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

Case Number: 3 08 70552

JCS

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state that the following is true and correct to the best of my knowledge and belief. On or about 3/10/2007 through 3/22/2007 in San Francisco County, in the Northern District of California defendant(s) did,

(Track Statutory Language of Offense)

knowingly in or affecting interstate commerce, aid and abet the recruiting, enticing, harboring, transporting, providing, or obtaining by any means a person, knowing that the person had not attained the age of 18, and would be caused to engage in a commercial sex act

in violation of Title 18 United States Code, Section(s) 2 and 1591

I further state that I am a(n) Special Agent with the FBI and that this complaint is based on the following facts:

See Attached Affidavit of Matthew S. Beaupain, attached and incorporated herein.

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No

Approved

As To

Form: Denise Marie Barton

AUSA



Name/Signature of Complainant



Sworn to before me and subscribed in my presence,

Date

8/20/08

at San Francisco, CA

City and State

Joseph C. Spero

US Magistrate Judge

Name &amp; Title of Judicial Officer

Signature of Judicial Officer



1 NORTHERN DISTRICT OF CALIFORNIA. )  
 2 ) ss:  
 3 COUNTY OF SAN FRANCISCO )  
 4

### 5 AFFIDAVIT

6 I, Matthew S. Beaupain, Special Agent of the Federal Bureau of Investigation, being duly  
 7 sworn, hereby declare as follows:

#### 8 I. INTRODUCTION AND PURPOSE OF AFFIDAVIT

9 1. This affidavit is being submitted in support of a criminal complaint charging  
 10 DAPHENE MCKENZIE VICKERS, also known as California Slim, Terri, Daphene Johnson,  
 11 Daphene Blaylock (VICKERS), with Aiding and Abetting the Sex Trafficking of a Minor, in  
 12 violation of Title 18, United States Code, Sections 2 and 1591.

#### 13 II. AGENT'S BACKGROUND AND EXPERTISE

14 2. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have  
 15 been so employed since November of 2005. For approximately the past two years, I have been  
 16 assigned to the San Francisco Office of the FBI, and have investigated cases involving violent  
 17 gangs, drug trafficking activity, bank robberies, fugitives, crimes aboard aircraft, and crimes  
 18 against children. During this time, I have participated in numerous local and federal search  
 19 warrants and arrests for crimes involving alleged narcotics trafficking, gang members, and crimes  
 20 against children. I have received training at the FBI Academy in Quantico, Virginia, including  
 21 training on Violent Street Gangs, Criminal Case Management, Informant Development, Title III  
 22 Investigations and the identification, use, packaging and sales of controlled substances, and  
 23 training at the National Center for Missing and Exploited Children which specifically focused on  
 24 child prostitution.

25 3. Through my training and experience, I have become familiar with the manner in  
 26 which pimps and prostitutes target, recruit, transport, control and prostitute minors for the  
 27 purpose of financial gain. I am also familiar in the manner as to how they collect and launder  
 28 their proceeds from prostitution. I have also had discussions with other law enforcement  
 personnel about the transportation and prostitution of minors, the methods in which they conduct

1 their trade, and the security measures that pimps and prostitutes often employ. As a federal  
2 agent, I am authorized to investigate violations of the laws of the United States and am a law  
3 enforcement officer with authority to execute warrants issued under the authority of the United  
4 States.

5 4. The statements contained in this affidavit are based on information provided to  
6 me by law enforcement officers as well as my training, experience, and knowledge of this  
7 investigation. Because this affidavit is being submitted for the limited purpose of supporting the  
8 issuance of a criminal complaint, I have not included each and every fact known to me  
9 concerning this investigation. I have set forth only those facts that I believe are necessary to  
10 establish probable cause to support the complaint.

### 11 **III. APPLICABLE LAW**

12 5. Title 18, United States Code, section 1591 provides that it is a crime to knowingly  
13 in or affecting interstate commerce, recruit, entice, harbor, transport, provide, or obtain by any  
14 means a person to engage in a commercial sex act, or benefit, financially or by receiving anything  
15 of value, from participation in any such venture, knowing that the person has not attained the age  
16 of 18 years.

17 6. For purposes of Title 18, United States Code, section 1591, the term "commercial  
18 sex act" means any sex act, on account of which anything of value is given to or received by any  
19 person. Further, the term "venture" means any group of two or more individuals associated in  
20 fact, whether or not a legal entity.

21 7. Title 18, United States Code, section 2 provides that any person who aids, abets,  
22 counsels, commands, induces or procures an offense against the United States or commission, is  
23 punishable as a principal.

### 24 **IV. PROBABLE CAUSE**

25 8. According to a female identified herein as V.S., and who was seventeen years old  
26 during all activities described in this Affidavit, she was in Baton Rouge, Louisiana working as a  
27 prostitute for an adult female named Tawakoni Seaton. In early March 2007, Seaton arranged for  
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1 V.S. to travel from Baton Rouge to San Francisco, California. Seaton told V.S. that she would  
2 be meeting "Daddy Rich" to work as a prostitute and showed V.S. a photo of "Daddy Rich." On  
3 or about March 7, 2007, V.S. left Baton Rouge via bus for San Francisco, California to meet  
4 "Daddy Rich." "Daddy Rich" has subsequently been identified as Shannon Blaylock. Blaylock  
5 and Seaton are both currently charged in United States v. Blaylock and Seaton, CR 07-0454 PJH.

6 9. On or about March 8, 2007, VICKERS paid cash for a flight from Los Angeles to  
7 Oakland, California. Airline records from Southwest Airlines show that VICKERS traveled on  
8 Southwest Airlines flight number 1702, arriving on or about 10:10 p.m. in Oakland, that same  
9 day.

10 10. On or about March 10, 2007, VICKERS and Blaylock met V.S. at the Greyhound  
11 bus station in San Francisco and transported V.S. to 1483 Newcomb Avenue, San Francisco,  
12 California to prepare V.S. for the purpose of prostitution. While at 1483 Newcomb Avenue,  
13 VICKERS helped V.S. with her hair and makeup so that V.S. could work as a prostitute that  
14 night.

15 11. On or before March 10, 2007, Blaylock had reserved a room under the name of  
16 "Arlandys Richardson" at the Marriott Residence Inn located at 1350 Veterans Boulevard in  
17 South San Francisco.

18 12. On or about March 10, 2007, Blaylock and VICKERS transported V.S. from 1483  
19 Newcomb Avenue, San Francisco, California to the Marriott Residence Inn, intending that V.S.  
20 would engage in prostitution in the room reserved.

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1           13.    On or about March 10, 2007, while at the Marriott Residence Inn, V.S. had a  
2 conversation with VICKERS while standing outside the Marriott Residence Inn. V.S. told  
3 VICKERS that she was 17 years old. Thereafter, V.S. engaged in prostitution at the Marriott  
4 Residence Inn.

5           14.    On an unknown date, between March 11, 2007 and March 22, 2007, while V.S.  
6 was engaged in acts of prostitution, VICKERS watched the time V.S. spent with her  
7 "customers." V.S. recalls one instance when VICKERS entered the room where V.S. was  
8 engaging in commercial sex acts and told the male customer who had paid for sex acts with V.S.  
9 that he had used his paid-for time and had to leave.

10          15.    On an unknown date, between March 11, 2007 and March 22, 2007, V.S. and  
11 VICKERS were scheduled to engage in a "double," a commercial sex act in which a man pays  
12 for the services of two prostitutes at one time. However, the client did not appear.

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SEALED BY ORDER OF CC

AO 442 (Rev. 10/03) Warrant for Arrest

## UNITED STATES DISTRICT COURT

Northern District of California

UNITED STATES OF AMERICA

V.

## WARRANT FOR ARREST

DAPHENE MCKENZIE VICKERS,

Case Number: 3 0 8 7 0 5 5 2 JCS

a/k/a California Slim, Terri, Daphene Johnson, Daphene  
BlaylockTo: The United States Marshal  
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest

DAPHENE MCKENZIE VICKERS

Name

and bring him or her forthwith to the nearest magistrate judge to answer a(n)

☐ Indictment  
 ☐ Information  
 ☒ Complaint  
 ☐ Order of court  
 ☐ Probation Violation Petition  
 ☐ Supervised Release Violation Petition  
 ☐ Violation Notice

charging him or her with (brief description of offense)

knowingly in or affecting interstate commerce, aid and abet the recruiting, enticing, harboring, transporting, providing, or obtaining by any means a person, knowing that the person had not attained the age of 18, and would be caused to engage in a commercial sex act

in violation of Title 18

United States Code, Section(s) 2 and 1591

Hon. Joseph C. Spero

Name of Issuing Officer

Signature of Issuing Officer

United States Magistrate Judge

Title of Issuing Officer

8/20/08

San Francisco, CA

Date and Location

NO Bail JCS

## RETURN

This warrant was received and executed with the arrest of the above-named defendant at

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		